

# EXHIBIT C

**Matthew B. Gilliam**

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**From:** Matthew B. Gilliam  
**Sent:** Thursday, August 20, 2020 6:29 PM  
**To:** 'Adam Greenfield'  
**Cc:** Ed Cloutman; Jeff D. Jennings  
**Subject:** RE: Carter - Discovery

Hi Adam and Ed,

I just wanted to follow up with a few questions from our phone call this afternoon. Ed, I know you weren't on the call, but maybe you have an answer to item #1.

- 1) Privilege Log- Regarding the amended privilege log, it states that "1,216 documents/files withheld because of attorney-client privilege." However, I count only 40 entries. Can you confirm whether you are withholding 1,216 documents (with some documents omitted from the log), or withholding only 40 documents totaling 1,216 pages?
- 2) RFPs 21 and 22 search terms- Adam, you mentioned that you did not have objections to our search terms for RFPs 21 and 22, and that you sent them to your IT group. Can we set an August 28, 2020 deadline for running those search terms for RFPs 21 and 22, and confirming whether you will review the hits and produce responsive documents?
- 3) Defining Local 556- Adam, can you review and confirm whether you agree with our proposal for who to include in the definition of Local 556 for various requests? We sent a word doc containing that information on August 11. I can re-send that if you do not have it.

Thanks,  
Matt

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**Matthew B. Gilliam**

Staff Attorney (*admitted and licensed to practice only in New York and West Virginia*)  
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**From:** Adam Greenfield <[agreenfield@candglegal.com](mailto:agreenfield@candglegal.com)>  
**Sent:** Thursday, August 20, 2020 2:42 PM  
**To:** Matthew B. Gilliam <[mbg@nrtw.org](mailto:mbg@nrtw.org)>  
**Cc:** Ed Cloutman <[ecoutman@lawoffices.email](mailto:ecoutman@lawoffices.email)>; Jeff D. Jennings <[jdj@nrtw.org](mailto:jdj@nrtw.org)>  
**Subject:** Re: Carter - Discovery

Gentleman—I am stuck on another call right now, are you free to push our callback to 3pm CST?

**Matthew B. Gilliam**

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**From:** Matthew B. Gilliam  
**Sent:** Friday, August 21, 2020 3:23 PM  
**To:** 'Adam Greenfield'  
**Cc:** Ed Cloutman; Jeff D. Jennings  
**Subject:** RE: Carter - Discovery

Adam,

Are you saying that the 40 individual entries consist of 1,216 pages? Your log currently shows that those 40 items only consist of 430 pages and reflects that there are actually 1,216 separate documents.

Thanks,  
Matt

**Matthew B. Gilliam**

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**From:** Adam Greenfield <[agreenfield@candglegal.com](mailto:agreenfield@candglegal.com)>  
**Sent:** Friday, August 21, 2020 3:02 PM  
**To:** Matthew B. Gilliam <[mbg@nrtw.org](mailto:mbg@nrtw.org)>  
**Cc:** Ed Cloutman <[ecloutman@lawoffices.email](mailto:ecloutman@lawoffices.email)>; Jeff D. Jennings <[jdj@nrtw.org](mailto:jdj@nrtw.org)>  
**Subject:** Re: Carter - Discovery

Matthew-- To clarify on the above, the updated privilege log lists all of the documents being withheld based on a privilege assertion. The total number 1216, represents pages that are incorporated with the 40 individual items listed.

Best, Adam

On Fri, Aug 21, 2020 at 9:51 AM Adam Greenfield <[agreenfield@candglegal.com](mailto:agreenfield@candglegal.com)> wrote:

Gentleman--

Please find attached Local 556's Third Amended Discovery, incorporating the changes we have previously discussed.

Regarding the above:

1. The information listed in the current privilege log is the accurate information regarding attorney client privilege documents. I believe there may have been some initial confusion regarding the number of pages withheld and actual documents.

2. I believe September 8th is feasible for turnaround time on running the additional search terms, with our review and production.
3. This relates to our discussions on proportionality. I believe the amended responses address this and have incorporated your requests.

I look forward to speaking with you shortly.

Sincerely, Adam